District Judge James L. Robart 1

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIO CURY, et al., Plaintiffs,

PLAINTIFFS' UNOPPOSED MOTION FOR AN EXTENSION OF v. TIME

DEPARTMENT OF STATE, et al.,

Noted for Consideration:

Civil Action No.: 2:23-cv-00499-JLR

Defendants. January 8, 2025

NOW COME Plaintiffs to respectfully request a four-day extension of all pending deadlines due to complications created by the inclement weather in the Washington, DC area where the undersigned resides.

Plaintiffs have good cause to request this extension. The undersigned's young children have been out of school for the last three days due to inclement weather, which has had a severe impact on his ability to work and required him to move several deadlines at the last minute. He has attempted to make progress on this Motion, but as mentioned in his previous motion, he has spent much of the weekend and what limited time he has had this week preparing witnesses for an administrative hearing which, until yesterday, was scheduled for today. This also had a

1	hydraulic effect on his other filing deadlines, one of which he was forced by the weather issues			
2	to extend until this Friday, the same day as his Opposition in this case is due. Accordingly, he			
3	requests the following minor modifications to the current schedule:			
4	1.	Plaintiffs will file their opposition and cross-motion, if any, on or before January		
5		14, 2025;		
6	2.	Defendants will file their reply	and opposition to any cross-motion on or before	
7		February 4, 2025; and		
8	3.	Plaintiffs will file their reply in	support of any cross-motion on or before February	
9		18, 2025.		
10	This is the second extension requested for this filing. Defendants' counsel has stated that			
11	they do not oppose this Motion.			
12	Date: January 8, 2025			
13			Respectfully submitted,	
14			/s/ Kelly B. McClanahan Kelly B. McClanahan, Esq., WSBA #60671	
15			National Security Counselors 4702 Levada Terrace	
16			Rockville, MD 20853 301-728-5908	
17	240-68 <u>Kel@l</u>		240-681-2189 fax <u>Kel@NationalSecurityLaw.org</u>	
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19			Counsel for Plaintiffs	
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